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October 14, 2004

Public Service Commission of South Carolina
Attention: Docketing Department
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Sir:

Enclosed for filing are the original and 10 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for November 2004 and preliminary December 2004. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with November data, and previews the changes BellSouth is considering making for December data. A Data Disclosure Report for October 2004 would be filed at this time as well, if needed; however, for October 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

Sincerely,



Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record
PC Docs # 553464

PROPOSED NOVEMBER 2004 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the November 2004 data month. Results for the November 2004 data month will be posted as follows:

Preliminary results December 20, 2004
Final results December 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) *Affected Measures:* OSS-1

Description of Change: Currently, PMAP is including additional CSR or RSAG query time in the calculation of LENS Due Date (DSAP) duration. BellSouth proposes to exclude CSR and RSAG time from the DSAP duration. (RQ5771 - CSR and RQ5780 - RSAG)

Impact of Change: For July 2004, in Georgia, the average interval to query LENS DSAP-DDI would decrease by at least 0.16 seconds, from 9.34 to 9.18 seconds.

(2) *Affected Measures:* OSS-1

Description of Change: Beginning with ENCORE Release 14.0, PMAP began receiving time stamps for timeout transactions that were after the transaction had already timed out. As a result PMAP was counting these erroneous intervals in the data. BellSouth proposes

to correct this problem by treating timeout transactions the same way they were treated before ENCORE Release 14.0 was implemented. (RQ5755)

Impact of Change: For August 2004, the average interval to query LENS would decrease by 0.59 seconds from 1.84 to 1.25

Provisioning Measurements

- (3.) *Affected Measures:* P-9 (Florida and Tennessee)

Description of Change: Currently, Retail Residence and Business POTS, excluding Switch Based Non-Dispatch data, ≥ 10 Circuits, is not being populated on the One Month Aggregate report in Tennessee and Florida when the CLEC volume is zero. BellSouth proposes to populate the Retail Analog for this disaggregation in all cases. This proposed change was Item (1) on the Preliminary November Data Notification filed on September 1, 2004. (RQ5521)

Impact of Change: BellSouth will begin reporting the data.

- (4.) *Affected Measures:* P-3 & P-12

Description of Change: Currently, if a service order that is completed on time is inadvertently assigned a missed appointment code, the order is being counted as a missed appointment. BellSouth proposes to only count missed appointments in cases where there is a valid missed appointment code on the order and the order was completed after the original committed due date. This proposed change was Item (2) on the Preliminary November Data Notification filed on September 1, 2004. (RQ5613)

Impact of Change: For May 2004, in Florida, the average missed appointment rate across all products decreased by 0.03% for retail and 0.02 % for CLECs.

M&R Measurements

- (5.) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: Currently, the field in LMOS used to identify the company to which troubles are assigned is not updated promptly. In some cases, this causes BellSouth Retail Troubles to be assigned to a CLEC. Bellsouth proposes to identify the company for trouble assignment using another field in LMOS that is updated promptly when a customer moves from a CLEC to BellSouth. This proposed change was Item (3) on the Preliminary November Data Notification filed on September 1, 2004. (RQ5595)

Impact of Change: For May 2004 data, in Georgia, the CLEC Customer Trouble Report Rate would be reduced by the following amounts: Resale Residence – Dispatch, 0.55%, Non Dispatch, 0.34%; Resale Business-Dispatch 0.14%, Non Dispatch 0.06%. Retail results would increase by less than .01%.

(6.) *Affected Measures:* MR-2

Description of Change: Currently, for Resale line count, BellSouth uses a file that gives a snapshot of lines in service at the end of the month. This snapshot does not reflect adjustments to the line count that are made during the process of closing the books for the month. BellSouth proposes to use a feed that reflects this final line count after the books are closed. This proposed change was Item (4) on the Preliminary November Data Notification filed on September 1, 2004. (RQ5673)

Impact of Change: For June 2004, the data for Georgia Customer Trouble Report Rate would be reduced by the following amounts:

<u>CLEC</u>	
Residence	-0.59%
Business	-0.44%
PBX	-0.04%
Centrex	-0.44%
Residence & Business (POTS)	-0.76%

Other Measurements

(7.) *Affected Measures:* All

Description of Change: BellSouth proposes to remove the Wholesale Company Key and Description (where applicable) from the SDF and OSDF Files. These fields are not used to replicate data. This proposed change was Item (5) on the Preliminary November Data Notification filed on September 1, 2004. (RQ5352)

Impact of Change: No impact to results

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PRELIMINARY DECEMBER 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the December 2004 data month. Results for the December 2004 data month will be posted as follows:

Preliminary results January 20, 2004
Final results January 31, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) *Affected Measures:* O-7, O-8 & O-11

Description of Change: Currently, when there is a Partially Mechanized FOC or Clarification in LNP for the same CC/PON/VER that was previously used on an LSR that resulted in a Fatal Reject, BellSouth is incorrectly counting the Fatal Reject as a Fully Mechanized Reject. The subsequent LSR and Response are also correctly counted as a Partially Mechanized FOC or Reject. BellSouth proposes to update the PMAP code to capture only the Partially Mechanized FOC or Reject because Fatal Rejects should not be reflected in the data, per the SQM. (RQ5698)

Impact of Change: For June 2004, 6 Fully Mechanized LSRs that were fatally rejected in the region, were counted as Fully Mechanized Rejects for the Reject Interval Measure (O-8) and should not have been.

- (2) *Affected Measures:* O-8 & O-9

Description of Change: Effective August 2, 2004, per Carrier Notification Letter SN91084141, all remaining LSRs processed in the Atlanta LCSC were transitioned to the Birmingham LCSC. BellSouth proposes to make changes to the coding to reflect the hours of operation of the Birmingham LCSC. (RQ5779)

Impact of Change: No LSRs were impacted by this change in the June 2004, data month.

Provisioning Measurements

- (3) *Affected Measures:* P-7, P-7A & P-7B

Description of Change: Currently BellSouth uses Original Committed Due Date to determine the reporting period for these measures. BellSouth proposes to use the completion date to determine the reporting period consistent with the other Provisioning measures. (RQ5621)

Impact of Change: For May 2004, in Florida, one less record would have been reported. This record would have been reported in June data.

- (4) *Affected Measures:* P-11 Mechanized (Georgia, Florida, Kentucky, and Tennessee)

Description of Change: With the implementation of the ENCORE Release 16.0, BellSouth discovered that changes in the tables caused some xDSL, UDC, UCL, and EELs orders to be erroneously omitted from this measure. BellSouth proposes correcting the code to include these Partially Mechanized orders. (RQ5687)

Impact of Change: For June 2004, the result for the UNE disaggregation would have decreased by .016%.

- (5) *Affected Measures:* P-4A & P-4B (Georgia)

Description of Change: Currently, the SRS reports are displaying the incorrect retail analog for products of UNE 2W Loop Design, 2W Loop Design with INP and 2W Loop Design with LNP. The analog currently being displayed is Residence and Business Dispatch plus One Day. BellSouth proposes to display the correct analog of Residence and Business POTS plus One Day (RQ5717)

Impact of Change: For July 2004, in Georgia, the retail analog that would be displayed would change from 6.64 days to 6.47 days.

Billing Measurements

(6) *Affected Measures:* B-10

Description of Change: Currently, BellSouth reports data for this measure based on the month in which the dispute is resolved and divides this number into all responses sent in that month. This mismatch occasionally causes reported results to exceed 100%. BellSouth proposes to correct the code to use the month received as the month upon which the data is based. The received date will also be added to raw data. (RQ5621)

Impact of Change: For July 2004, in Florida, 3 of 3965 records (.0007%) were incorrectly marked causing a 100.88% reported result for Resale.

Special Access Measurements

(7) *Affected Measures:* SA-3 (Tennessee)

Description of Change: Currently, on the Tennessee Aggregate Special Access Offered vs. Requested Due Date (Non-Distribution) Report, both the numerator and the denominator are being overstated by approximately equal amounts due to a programming error affecting this measurement. BellSouth proposes to implement changes in the coding to correct this problem. (RQ5398)

Impact of Change: For June 2004, the percentage of the time BellSouth met the Requested Due Date for DS1 would change from 98.49% to 96.97%.

Other Measurements

(8) *Affected Measures:* TGP-1 & TGP-2

Description of Change: Currently, the Trunk Group Reports are produced manually. BellSouth proposes to mechanize the Trunk Group Reports in PMAP. (RQ4857)

Impact of Change: No impact to data.

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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed November 2004 Data Notification Report and Preliminary December 2004 Data Notification Report in Docket No. 2001-209-C to be served upon the following this October 14, 2004:

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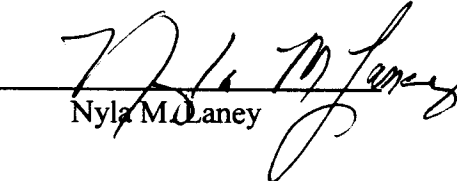
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